

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re	:	Chapter 11
	:	
W.R. Grace & Co., <i>et al.</i>	:	Case No. 01-01139 JKF
	:	
Debtors.	:	

**CERTAIN PLAN OBJECTORS' NOTICE OF DESIGNATIONS  
FOR PHASE II OF THE CONFIRMATION HEARING  
WITH RESPECT TO THE DEPOSITION OF MARK PETERSON**

The undersigned parties (collectively, "Certain Plan Objectors"), by and through their respective undersigned attorneys, hereby designate the attached excerpts from the transcript of the deposition of Mark Peterson, taken on June 9, 2009 (the "Deposition Transcript"), together with any pertinent exhibits thereto, which may be offered in evidence in connection with Phase II of the Confirmation Hearing in this matter, pursuant to Rule 32 of the Federal Rules of Civil Procedure. Certain Plan Objectors reserve the right to supplement these designations following receipt of Plan Proponents' counter-designations, if any. Certain Plan Objectors further reserve the right to use any part of the Deposition Transcript, even if it is not designated, for the purpose of contradicting or impeaching testimony given by the deponent as a witness. Finally, Certain Plan Objectors reserve the right to call the witness at trial to supplement the deposition testimony designated herein.

An excerpted copy of the Deposition Transcript, together with pertinent exhibits, is attached as Exhibit "A" hereto, with the portions designated by Certain Plan Objectors marked in green.

Dated: August 14, 2009  
Wilmington, Delaware

DRINKER BIDDLE & REATH LLP

/s/ David P. Primack  
Warren T. Pratt (4334)  
David P. Primack (4449)  
1100 N. Market Street, Suite 1000  
Wilmington, DE 19801-1254  
Telephone: 302-467-4200

- and -

Michael F. Brown (*pro hac vice*)  
Jeffrey M. Boerger (*pro hac vice*)  
One Logan Square  
Philadelphia, PA 19103-6996  
Telephone: 215-988-2700

*Attorneys for Government Employees  
Insurance Company, Republic Insurance  
Company n/k/a Starr Indemnity &  
Liability Company, OneBeacon America  
Insurance Company, and Seaton  
Insurance Company*

STEVENS & LEE, P.C.

/s/ John D. Demmy.  
John D. Demmy (DE Bar No. 2802)  
1105 North Market Street  
7th Floor  
Wilmington, DE 19801  
Telephone: (302) 425-3308  
Facsimile: (610) 371-8515  
Email: jdd@stevenslee.com

-and-

Leonard P. Goldberger  
Marnie E. Simon  
(Members of the PA Bar)  
1818 Market Street  
29th Floor  
Philadelphia, PA 19103-1702  
Telephone: (215) 751-2864/2885  
Facsimile: (610) 371-7376/8505  
Email: lpg@stevenslee.com  
Email: mes@stevenslee.com

*Attorneys for Fireman's Fund Insurance  
Company and Allianz S.p.A., f/k/a  
Riunione Adriatica Di Sicurta, and  
Allianz SE, f/k/a Allianz Aktiengesellschaft*

CONOLLY BOVE LODGE & HUTZ  
LLP

/s/ Jeffrey C. Wisler

Jeffrey C. Wisler (#2795)  
Marc J. Phillips (#4445)  
The Nemours Building  
1007 N. Orange Street  
P.O. Box 2207  
Wilmington, DE 19899  
Telephone: (302) 658-9141  
Facsimile: (302) 658-0380

OF COUNSEL:

ECKERT SEAMANS CHERIN &  
MELLOTT, LLC  
Edward J. Longosz, II  
Gabriella Cellarosi  
1747 Pennsylvania Avenue, N.W.  
Suite 1200  
Washington, D.C. 20006  
Telephone: (202) 659-6600  
Facsimile: (202) 659-6699

WILEY REIN LLP  
Richard A. Ifft  
Karalee C. Morell  
1776 K Street, N.W.  
Washington, D.C. 20006  
Telephone: (202) 719-7170  
Facsimile: (202) 719-7049

*Attorneys for Maryland Casualty  
Company, Zurich Insurance Company and  
Zurich International (Bermuda) Ltd.*

ROSENTHAL, MONHAIT &  
GODDESS, P.A.

/s/ Edward B. Rosenthal

Edward B. Rosenthal (Bar No. 3131)  
P.O. Box 1070  
Wilmington, Delaware 19899  
Telephone: (302) 656-4433x6  
Facsimile: (302) 658-7567

-and-

GOODWIN PROCTER LLP  
Daniel M. Glosband (*pro hac vice*)  
Brian H. Mukherjee (*pro hac vice*)  
Exchange Place  
Boston, Massachusetts 02109  
Telephone: (617) 570-1000  
Facsimile: (617) 523-1231

-and-

Michael S. Giannotto (*pro hac vice*)  
Frederick C. Shafrick (*pro hac vice*)  
901 New York Avenue, N.W.  
Washington, D.C. 20001  
Telephone: (202) 346-4000  
Facsimile: (202) 346-4444

-and-

FORD MARRIN ESPOSITO  
WITMEYER & GLESER, L.L.P.  
Elizabeth DeCristofaro (*pro hac vice*)  
Wall Street Plaza  
23rd Floor  
New York, New York 10005-1875  
Telephone: (212) 269-4900  
Facsimile: (212) 344-4294

*Attorneys for Continental Casualty  
Company and Continental Insurance  
Company and related subsidiaries and  
affiliates*

COZEN O'CONNOR

/s/ Barry Klayman  
Barry M. Klayman (DE No. 3676)  
1201 N. Market Street  
Suite 1400  
Wilmington, DE 19801  
Telephone: (302) 295-2035  
Facsimile: (215) 701-2209

- and -

William P. Shelley (PA ID 40875)  
Jacob C. Cohn (PA ID 54139)  
Ilan Rosenberg (PA ID 89668)  
1900 Market Street  
Philadelphia, PA 19103  
Telephone: (215) 665-2000  
Facsimile: (215) 665-2013

*Attorneys for Federal Insurance Company*

TUCKER ARENSBERG

/s/ Michael A. Shiner  
Michael A. Shiner, *pro hac vice*  
1500 One PPG Place  
Pittsburgh, PA 15222-5401  
Telephone: (412) 566-1212  
Facsimile: (412) 594-5619  
Email: mshiner@tuckerlaw.com

-and-

MENDES & MOUNT, LLP  
Eileen T. McCabe, *pro hac vice*  
750 Seventh Avenue  
New York, NY 10019  
Telephone: (212) 261-8254  
Facsimile: (302) 235-2536  
Email: eileen.mccabe@mendes.com

-and-

John S. Spadaro (No. 3155)  
724 Yorklyn Road  
Suite 375  
Hockessin, DE 19707  
Telephone: (302) 235-7745  
Facsimile: (302) 235-2536  
Email:  
jspadaro@johnsheehanspadaro.com

*Attorneys for AXA Belgium as successor  
to Royal Belge SA*